

Exhibit 2

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SIA HENRY, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, et al.,

Defendants.

Case No. 1:22-cv-125

**DECLARATION OF LISA HAWKINS
OF ANGEION GROUP, LLC RE:
COMPLIANCE WITH 28
U.S.C. § 1715(b)**

I, Lisa Hawkins, hereby declare under penalty of perjury pursuant to 28 U.S.C.
§ 1746 that the following is true and correct:

1. I am a Project Coordinator with Angeion Group (“Angeion”), located at 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. Angeion was retained as the Settlement Administrator for the proposed class action settlement of *Henry et al v. Brown University et al.*, Case No. 1:22-cv-00125. As a result, Angeion was asked to effectuate notice of the Parties’ proposed class action settlement to the appropriate federal and state officials, as provided by the Class Action Fairness Act (“CAFA”) of 2005, 28 U.S.C. § 1715.

3. On January 17, 2025, Plaintiff filed a motion for preliminary approval of the Class Action Settlement entered into between the Parties to this action. Accordingly, on April 24, 2025, pursuant to 28 U.S.C. § 1715(b), Angeion caused CAFA Notice letters regarding the settlement to

be sent to the Attorney General of the United States and all Attorneys General for the states and territories of the United States.¹ The CAFA Notice Letter contained a link to a case-specific CAFA web page hosted by Angeion with copies of the letter's enclosure documents. A copy of this CAFA Notice letter is attached hereto as **Exhibit A**. A copy of the contact list is attached hereto as **Exhibit B**.

4. As of the date of this declaration, Angeion has received no responses to the CAFA Notice letters from any Federal or State officials.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: April 24, 2025



LISA HAWKINS

¹ CAFA Notices were sent via the United States Postal Service's Priority Mail, except for the office of the Attorney General for Nevada, which has requested that CAFA notifications be sent via email.

Exhibit A



1650 Arch Street • Suite 2210 • Philadelphia PA 19103
www.angeiongroup.com

April 24, 2025

VIA USPS PRIORITY MAIL

United States Attorney General & Appropriate Officials

Re: Notice of Proposed Class Action Settlement

Dear Counsel or Official:

Angeion Group, an independent claims administrator, on behalf of Defendant The Johns Hopkins University in the below-described action, hereby provides your office with this notice under the provisions of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, to advise you of the following proposed class action settlement:

Case Name: *Henry et al v. Brown University et al*

Case No.: Case No. 1:22-cv-00125

Jurisdiction: United States District Court Northern District of Illinois

Date Settlement Filed with Court: January 17, 2025

In accordance with the requirements of 28 U.S.C. § 1715, copies of the following documents associated with this action are available at <https://cafa.angeiongroup.com/>:

1. **28 U.S.C. § 1715(b)(1)-Complaint:** The *Complaint* was filed with the Court on January 9, 2022; the *Amended Complaint* was filed with the Court on February 15, 2022; and the *Second Amended and Supplemental Class Action Complaint* was filed with the Court on February 6, 2023.
2. **28 U.S.C. § 1715(b)(2)-Notice of Any Scheduled Judicial Hearings:** The Court held the Preliminary Approval Hearing on January 24, 2025, at 1:00 PM CT.
3. **28 U.S.C. § 1715(b)(3)-Notification to Class Members:** The proposed *Notice of Class Action Settlements*; the *Email Notice*; and *Notice Plan* were filed with the Court on January 17, 2025.
4. **28 U.S.C. § 1715(b)(4)-Class Action Settlement Agreement:** The *Settlement Agreement Between the California Institute of Technology and the Proposed Class of Plaintiffs* was filed with the Court on January 17, 2025. The *Plaintiffs' Motion for Preliminary Approval of Settlements With Defendants California Institute of Technology and the Johns Hopkins*

Notice of Proposed Class Action Settlement

University, Provisional Certification of the Proposed Settlement Class, Approval of the Fourth Tranche Notice Plan, Approval of the Fourth Tranche Allocation Plan, and Approval of the Schedule for Completing the Settlement Process; the Plaintiffs' Memorandum of Law in Support of Their Motion for Preliminary Approval of Settlements with Defendants California Institute of Technology and the Johns Hopkins University, Confirmation of Certification of the Proposed Settlement Class, Approval of the Fourth Tranche Notice Plan, Approval of the Fourth Tranche Allocation Plan, and Approval of the Schedule for Completing the Settlement Process; the Joint Declaration of Edward Normand, Robert D. Gilbert & Eric Cramer in Support of Preliminary Approval of Settlements with Defendants California Institute of Technology and the Johns Hopkins University, Confirmation of Certification of the Proposed Settlement Class, Approval of the Fourth Tranche Notice Plan, Approval of the Fourth Tranche Allocation Plan, and Approval of the Schedule for Completing the Settlement Process; and the Custodian/Escrow Agreement For Fourth Tranche Of Settlements were filed with the Court on January 17, 2025.

5. **28 U.S.C. § 1715(b)(5)-Any Settlement or Other Agreements:** The *Settlement Agreement between the University of Chicago and the Proposed Class of Plaintiffs* was filed with the Court on August 14, 2023 (the "First Tranche Settlement"). The *Settlement Agreement Between Emory University and the Proposed Class of Plaintiffs*; the *Settlement Agreement Between Yale University and the Proposed Class of Plaintiffs*; the *Settlement Agreement Between Brown University and the Proposed Class of Plaintiffs*; the *Settlement Agreement Between the Trustees of Columbia University in the City of New York and the Proposed Class of Plaintiffs*; and the *Settlement Agreement Between Duke University and the Proposed Class of Plaintiffs* were filed with the Court on January 23, 2024 (the "Second Tranche Settlement"). The *Settlement Agreement Between Defendant the Trustees of Dartmouth College and the Proposed Class of Plaintiffs*; the *Settlement Agreement Between William Marsh Rice University and the Proposed Class of Plaintiffs*; the *Settlement Agreement Between Northwestern University and the Proposed Class of Plaintiffs*; and the *Settlement Agreement Between Vanderbilt University and the Proposed Class of Plaintiffs* were filed with the Court on February 23, 2024 (the "Third Tranche Settlement"). The *Settlement Agreement Between the California Institute of Technology and the Proposed Class of Plaintiffs* was filed with the Court on January 17, 2025 (together with Johns Hopkins University Settlement, the "Fourth Tranche Settlements").
6. **28 U.S.C. § 1715(b)(6)-Final Judgment:** The Court issued an order granting final judgment and order of dismissal approving the First, Second, and Third Tranche Settlements on July 20, 2024.

Notice of Proposed Class Action Settlement

As of the date of this Notice, no Final Judgment or notice of dismissal has been entered in this case.

7. **28 U.S.C. § 1715(b)(7)(B)-Estimate of Class Members:** There are an estimated 379,334 persons potentially in the Settlement Class. A chart listing the number of Settlement Class Members that likely reside in each state is available at <https://cafa.angeiongroup.com/>. It is not feasible to provide the proportionate share of the Settlement benefits per state as class member awards are contingent upon the submission of a claim form.
8. **28 U.S.C. §1715(b)(8)-Judicial Opinions Related to the Settlement:** The Court issued orders granting preliminary approval of the First Tranche Settlement on September 9, 2023; the Second Tranche Settlements on February 14, 2024; and the Third Tranche Settlements on February 28, 2024. The Court issued an order granting final approval of the First, Second, and Third Tranche Settlements on July 20, 2024. The Court has not issued a judicial opinion concerning the proposed settlement at this time. The *[Proposed] Order Granting Preliminary Approval of Settlements with Defendants California Institute of Technology and the Johns Hopkins University, Provisional Certification of the Proposed Settlement Class, Approval of The Fourth Tranche Notice Plan, Approval of The Fourth Tranche Allocation Plan, and Approval of the Schedule for Completing the Settlement Process* is available at <https://cafa.angeiongroup.com/>.

If you have any questions regarding the details of this notice, or if you need assistance accessing the CAFA website, please contact Angeion Group at:

Angeion Group

1650 Arch Street, Suite 2210

Philadelphia PA 19103

www.angeiongroup.com

info@angeiongroup.com

Exhibit B

#	Company	Address
1	Office of the Alabama Attorney General	501 Washington Avenue, PO Box 300152, Montgomery, AL, 36130-0152
2	Office of the Alaska Attorney General	1031 W 4th Avenue, Suite 200, Anchorage, AK, 99501-1994
3	Office of the Arizona Attorney General	2005 N Central Ave, Phoenix, AZ, 85004-2926
4	Arkansas Attorney General Office	323 Center Street, Suite 200, Little Rock, AR, 72201-2610
5	Office of the California Attorney General	455 Golden Gate Ave, Ste 11000, Consumer Law Section, San Francisco, CA, 94102
6	Office of the Colorado Attorney General	Ralph L. Carr Colorado Judicial Center, 1300 Broadway, 10th Floor, Denver, CO, 80203
7	State of Connecticut Attorney General's Office	165 Capitol Ave, Hartford, CT, 6106
8	District of Columbia Attorney General	400 6th St, NW, Washington, DC, 20001
9	Delaware Attorney General	820 N. French Street 6th FL, Carvel State Office Building, Wilmington, DE, 19801
10	Office of the Attorney General of Florida	The Capitol, PL-01, Tallahassee, FL, 32399-1050
11	Office of the Georgia Attorney General	40 Capitol Square, SW, Atlanta, GA, 30334-1300
12	Office of the Hawaii Attorney General	425 Queen Street, Honolulu, HI, 96813
13	State of Idaho Attorney General's Office	700 W Jefferson St Suite 210, PO Box 83720, Boise, ID, 83720-0010
14	Illinois Attorney General	100 W. Randolph Street, James R. Thompson Center, Chicago, IL, 60601
15	Indiana Attorney General's Office	302 West Washington Street, 5th Floor, Indiana Government Center South, Indianapolis, IN, 46204
16	Iowa Attorney General	1305 E. Walnut Street, Hoover State Office Building, Des Moines, IA, 50319
17	Kansas Attorney General	120 S.W. 10th Ave., 2nd Floor, Topeka, KS, 66612
18	Office of the Kentucky Attorney General	700 Capitol Ave, Capitol Building, Suite 118, Frankfort, KY, 40601-3449
19	Office of the Louisiana Attorney General	PO Box 94005, Baton Rouge, LA, 70804-4095
20	Office of the Maine Attorney General	6 State House Station, Augusta, ME, 04333
21	Office of the Maryland Attorney General	200 St. Paul Place, Baltimore, MD, 21202-2202

22	Office of the Attorney General of Massachusetts	1 Ashburton Place, 20th Floor, Boston, MA, 02108-1698
23	Office of the Michigan Attorney General	525 W. Ottawa Street, PO Box 30212, G Mennen Williams Bldg., 7th Fl, Lansing, MI, 48909
24	Minnesota Attorney General's Office	445 Minnesota St Ste 1400, STATE CAPITOL, St. Paul, MN, 55101-2190
25	Mississippi Attorney General's Office	550 High Street, Suite 1200, Walter Sillers Building, Jackson, MS, 39201
26	Missouri Attorney General's Office	207 W. High Street, PO Box 899, Supreme Court Building, Jefferson City, MO, 65101
27	Office of the Montana Attorney General	215 N Sanders, Justice Bldg, Helena, MT, 59620-1401
28	Office of the Nebraska Attorney General	PO BOX 98920, 2115 State Capitol, Lincoln, NE, 68509
29	Nevada Attorney General	100 North Carson Street, Old Supreme Ct. Bldg., Carson City, NV, 89701
30	New Hampshire Attorney General	33 Capitol Street, State House Annex, Concord, NH, 03301-6397
31	Office of the New Jersey Attorney General	25 Market Street, PO Box 080, Richard J. Hughes Justice Complex, Trenton, NJ, 08625
32	Office of the New Mexico Attorney General	PO Drawer 1508, Santa Fe, NM, 87504-1508
33	Office of the New York Attorney General	28 Liberty ST, New York, NY, 10005
34	Office of the North Carolina Attorney General	9001 Mail Service Center, Raleigh, NC, 27699-9001
35	State of North Dakota Office of the Attorney General	600 E. Boulevard Avenue, Dept 125, State Capitol, Bismarck, ND, 58505-0040
36	Ohio Attorney General	30 E. Broad Street, 14th Floor, State Office Tower, Columbus, OH, 43215
37	Oklahoma Office of the Attorney General	313 NE 21st Street, Oklahoma City, OK, 73105
38	Office of the Oregon Attorney General	1162 Court Street NE, Oregon Department of Justice, Salem, OR, 97301-4096
39	Pennsylvania Office of the Attorney General	1600 Strawberry Square, 16 FL, Harrisburg, PA, 17120
40	State of Rhode Island Office of the Attorney General	150 South Main Street, Providence, RI, 02903

41	South Carolina Attorney General	PO Box 11549, Rembert C. Dennis Bldg., Columbia, SC, 29211-1549
42	South Dakota Office of the Attorney General	1302 East Highway 14, Suite 1, Pierre, SD, 57501-8501
43	Tennessee Office of the Attorney General and Repo	PO Box 20207, Nashville, TN, 37202-0207
44	Attorney General of Texas	PO Box 12548, Capitol Station, Austin, TX, 78711-2548
45	Utah Office of the Attorney General	PO Box 142320, 350 North State Street Suite 230, Salt Lake City, UT, 84114-2320
46	Office of the Attorney General of Vermont	109 State Street, Montpelier, VT, 05609-1001
47	Office of the Virginia Attorney General	202 North Ninth Street, Richmond, VA, 23219
48	Washington State Office of the Attorney General	1125 Washington St SE, P.O. Box 40100, Olympia, WA, 98504-0100
49	West Virginia Attorney General	1900 Kanawha Blvd., E., Capitol Complex, Building 1, Room E-26, Charleston, WV, 25305
50	Office of the Wisconsin Attorney General	PO Box 7857, Wisconsin Department of Justice, State Capitol, Room 114 East, Madison, WI, 53707-7857
51	Office of the Wyoming Attorney General	2320 Capitol Ave, Kendrick Building, Cheyenne, WY, 82002
52	Office of the Attorney General of the United States	950 Pennsylvania Avenue, NW, United States Department of Justice, Washington, DC, 20530-0001

#	Company (U.S. Territories)	Address
1	American Samoa Attorney General	
2	Office of the Attorney General Guam	590 S MARINE CORPS DR, STE 706 ITC BLDG, Tamuning, GU 96913
3	Office of the Northern Mariana Islands Attorney Ge	PO BOX 10007, Administration Building, Siapan, MP 96950
4	Puerto Rico Secretary of Justice	PO BOX 9020192, San Juan, PR, 00902
5	Virgin Islands Attorney General	3438 Kronprindsens Gade, GERS Building, 2nd FL, St. Thomas, VI 00802